

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
HINDS COUNTY, MISSISSIPPI**

**DR. DONALD RAGGIO
DR. CHRIS RAGGIO**

PLAINTIFFS

VS.

CAUSE NO. 14-CV-00071-TTG

MTGOX, et al.

DEFENDANTS

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' SECOND SET OF REQUESTS FOR ADMISSION**

COME NOW the Plaintiffs, by and through counsel, in the above styled and numbered cause, and file this their Response to Defendants' Second Set of Requests for Admission, as follows:

GENERAL OBJECTIONS AND QUALIFICATIONS

These responses are made based on information presently available to the Plaintiffs. As discovery in this case is incomplete, there may be further facts that develop which may affect the Plaintiffs' response which the Plaintiffs are presently unaware despite due diligence. The Plaintiffs reserve the right to modify or supplement their response with such relevant information they may subsequently discover. As such, their response is made without prejudice to them using or relying at trial on information herein omitted through a good faith oversight, error or mistake, though subsequently discovered.

Subject to these general qualifications, specific objections and responses are set out below:

REQUEST NO. 1:

Admit you did not file a claim in any bankruptcy case proceeding, or action in which MTGOX is a debtor.

RESPONSE: Admitted.

REQUEST NO. 2:

Admit you did not file a claim in any bankruptcy case proceeding, or action in which Mark Karpeles is a debtor.

RESPONSE: Admitted.

RESPECTFULLY SUBMITTED, this the 30th day of August, 2017.

**DR. DONALD RAGGIO
AND CHRIS RAGGIO**

s/Charles "Brad" Martin
CHARLES "BRAD" MARTIN, MSB# 100767

OF COUNSEL:
MITCHELL H. TYNER, SR., MSB# 8169
CHARLES "BRAD" MARTIN, MSB# 100767
TYNER, GOZA, STACEY & MARTIN, LLC
114 West Center Street
Canton, MS 39046
Phone: 601-401-1111
Fax: 601-957-6554

CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a true and correct copy of the above and foregoing pleading via email on the following:

Edwin S. Gault, Jr., Esq.
Mandie B. Robinson, Esq.
Forman Watkins & Krutz LLP
210 East Capitol Street, Suite 2200
Jackson, MS 39201-2375

Ethan Jacobs, Esq.
Holland Law, LLP
220 Montgomery Street, Suite 800
San Francisco, California 94104

Respectfully submitted, this the 30th day of August, 2017.

s/ Charles B. Martin
CHARLES "BRAD" MARTIN, MSB# 100767